

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

Cedrone, LLC d/b/a Shawsheen Firearms,	)	
et. al.,	)	
Plaintiffs	)	
	)	
v.	)	Civil Action No.: 4:20-cv-40041
	)	
Charles Duane Baker, Jr., in his Capacity as	)	
Governor of the Commonwealth of Massachusetts,	)	
et. al.,	)	
Defendants	)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY**

Plaintiffs Cedrone, LLC d/b/a Shawsheen Firearms, et. al., (“Plaintiffs”), by and through their attorney, and pursuant to Local Rule 7.1(b)(3), hereby moves this Court for leave to file a reply brief, not to exceed fifteen pages, in support of Plaintiffs’ Emergency Motion for Ex-Parte Temporary Restraining Order. As grounds therefore, Plaintiffs state as follows:

1. Plaintiffs filed their Emergency Motion for Ex-Parte Temporary Restraining Order and Memorandum of Law in Support of Emergency Motion for Ex-Parte Temporary Restraining Order on April 15<sup>th</sup>, 2020.
2. Plaintiffs now seek leave to file a short reply brief to respond to a few issues raised in Defendants’ Opposition that Plaintiffs could not have reasonably anticipated. For example, Defendants misstated the applicable standard of review; they treat their opposition as an opportunity to raise new issues which are not relevant to the pleadings; and they raise irrelevant issues.
3. Plaintiffs believe that their proposed reply will serve to clarify the issues presented by their Emergency Motion for Ex-Parte Temporary Restraining Order and Defendants’ Opposition, and will assist the Court in resolving that motion.

4. On April 30, 2020, counsel for the parties conferred regarding this request for leave to file a reply brief. Counsel for Defendants conveyed
5. Plaintiffs are attaching a proposed Reply to this Motion. Plaintiffs respectfully request the opportunity to file their Reply on or before May 1, 2020.

WHEREFORE, Plaintiffs respectfully request that the Court grant Plaintiffs' request to file a reply brief in support of their Emergency Motion for Ex-Parte Temporary Restraining Order, and allow Plaintiffs until Friday, May 1, 2020 to file their Reply.

Dated: April 30, 2020

Respectfully submitted,  
The Plaintiffs,  
By their attorney,

/s/ Andrew J. Couture  
Andrew J. Couture, Esq. BBO # 671193  
Law Office of Andrew J. Couture  
81 Merriam Avenue  
Leominster, MA 01453  
Tel: (978) 502-0221

**CERTIFICATE OF COMPLAINE WITH LOCAL RULE 7.1**

I hereby certify that pursuant to Local Rule 7.1., this office conferred with Defendants' counsel regarding the relief requested in this motion, and the Defendants do not oppose the filing of a reply brief.

/s/ Andrew J. Couture  
Andrew J. Couture, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 30, 2020.

/s/ Andrew J. Couture  
Andrew J. Couture